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11 DISH NETWORK CORPORATION  
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14 UNITED STATES DISTRICT COURT  
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16 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
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18 UNITED STATES OF AMERICA,  
19 Plaintiff,

20 v.  
21

22 VIRTUAL CURRENCY AND  
\$2,061,517.68 IN U.S. CURRENCY,  
23 Defendants.

24 Case No. 2:25-CV-04631

25 **CLAIMANT DISH NETWORK  
CORPORATION'S ANSWER TO  
COMPLAINT FOR FORFEITURE**

26 Trial Date: None Set

27 **REDACTED VERSION OF  
DOCUMENT FILED UNDER SEAL  
PURSUANT TO ORDER OF  
THE COURT DATED 10/20/2025.**

28 Pursuant to Rule 8(b) of the Federal Rules of Civil Procedure, Claimant DISH  
NETWORK CORPORATION (“Claimant”) answers the Complaint for Forfeiture  
of Plaintiff United States of America (“Plaintiff”) filed on May 22, 2025 as ECF  
No. 1.

## **JURISDICTION AND VENUE<sup>1</sup>**

1. Paragraph 1 is a legal conclusion and argument as to which no response is required.

2. Paragraph 2 is a legal conclusion and argument as to which no response is required.

3. Paragraph 3 is a legal conclusion and argument as to which no response is required.

## **PERSONS AND ENTITIES**

4. Answering Paragraph 4, Claimant admits the allegation contained therein.

5. Answering Paragraph 5, and all subparts therein, Claimant lacks knowledge or information to admit or deny the allegations therein and on that basis takes no position regarding these allegations.

6. Answering Paragraph 6, Claimant lacks knowledge or information to admit or deny the allegations therein and on that basis takes no position regarding these allegations.

7. Answering Paragraph 7, Claimant lacks knowledge or information to admit or deny the allegations therein and on that basis takes no position regarding these allegations.

8. Answering Paragraph 8, Claimant lacks knowledge or information to admit or deny the allegations therein and on that basis takes no position regarding these allegations.

## **BASIS FOR FORFEITURE**

<sup>1</sup> This pleading uses the section headings appearing in Plaintiff's Complaint for ease of reference. Claimant lacks knowledge or information to admit or deny any allegations in Plaintiffs' section headings and on that basis takes no position regarding those allegations.

1   **I. Gallyamov is Indicted as A Result of His Orchestration of a Scheme to**  
2   **Infect Victim Computers and Extort Ransom Payments from Victims**

3         9. Answering Paragraph 9, Claimant admits that, in the cyberattack that it  
4 experienced in February 2023, the initial point of entry was via a phishing email  
5 associated with QBot (or “Qakbot”), which the Complaint alleges is the malicious  
6 computer software developed and deployed by the Qakbot Conspiracy led by  
7 Rustam Rafailevich Gallyamov (“Gallyamov”). The ransomware actor gained  
8 unauthorized access and control, and deployed ransomware and exfiltrated data  
9 from Claimant’s systems. Claimant otherwise lacks knowledge or information to  
10 admit or deny the allegations therein and on that basis takes no position regarding  
11 these allegations.

12         10. Answering Paragraph 10, Claimant lacks knowledge or information to  
13 admit or deny the allegations therein and on that basis takes no position regarding  
14 these allegations.

15         11. Answering Paragraph 11, Claimant admits that, in the cyberattack that  
16 it experienced in February 2023, the ransomware group self-identified as the Black  
17 Basta Group. Claimant’s understanding and belief is that the Black Basta Group  
18 worked with affiliate Qakbot. Claimant also admits that the initial point of entry was  
19 via a phishing email associated with QBot, which the Complaint alleges is the  
20 malicious computer software developed and deployed by the Qakbot Conspiracy led  
21 by Gallyamov. The ransomware actor deployed ransomware and exfiltrated data  
22 from Claimant’s systems, and then extorted Claimant to prevent further  
23 dissemination of the data. Claimant lacks knowledge or information to admit or  
24 deny the remainder of the allegations in Paragraph 11 and on that basis takes no  
25 position regarding these allegations.

26         12. Answering Paragraph 12, Claimant admits that in connection with the  
27 cyberattack that it experienced in February 2023, it paid the ransom in Bitcoin  
28 (BTC), which is one of the virtual currencies the Complaint alleges Gallyamov

1 received as part of his involvement in the Qakbot Conspiracy. Claimant lacks  
2 knowledge or information to admit or deny the remainder of the allegations in  
3 Paragraph 12 and on that basis takes no position regarding these allegations.

4       13. Answering Paragraph 13, Claimant lacks knowledge or information to  
5 admit or deny the allegations therein and on that basis takes no position regarding  
6 these allegations.

7       14. Answering Paragraph 14, Claimant admits that the ransom payment it  
8 made in connection with the February 2023 cyberattack perpetrated against it is  
9 subject to forfeiture, and otherwise lacks knowledge or information to admit or deny  
10 the allegations therein and on that basis takes no position regarding these  
11 allegations.

12       15. Answering Paragraph 15, and all subparts therein, Claimant admits that  
13 it paid the ransom in connection with the February 2023 cyberattack perpetrated  
14 against it in BTC, a virtual currency on the Bitcoin blockchain and which the  
15 Complaint alleges is one of the virtual currencies Gallyamov received as part of his  
16 involvement in the Qakbot Conspiracy, and otherwise lacks knowledge or  
17 information to admit or deny the allegations therein and on that basis takes no  
18 position regarding these allegations.

19       **II. The Defendant Assets Constitute Traceable Ransom and Laundered**  
20           **Proceeds.**

21       16. Answering Paragraph 16, Claimant lacks knowledge or information to  
22 admit or deny the allegations therein and on that basis takes no position regarding  
23 these allegations.

24           **A. The August 2023 Wallets Held Ransom and Laundered Proceeds.**

25       17. Answering Paragraph 17, Claimant lacks knowledge or information to  
26 admit or deny the allegations therein and on that basis takes no position regarding  
27 these allegations.

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1       18. Answering Paragraph 18, Claimant lacks knowledge or information to  
2 admit or deny the allegations therein and on that basis takes no position regarding  
3 these allegations.

4       19. Answering Paragraph 19, Claimant lacks knowledge or information to  
5 admit or deny the allegations therein and on that basis takes no position regarding  
6 these allegations.

7       20.

8           a. Answering Paragraph 20a, Claimant lacks knowledge or  
9 information to admit or deny the allegations therein and on that basis takes no  
10 position regarding these allegations.

11           b. Answering Paragraph 20b, Claimant lacks knowledge or  
12 information to admit or deny the allegations therein and on that basis takes no  
13 position regarding these allegations.

14           c. Answering Paragraph 20c, Claimant lacks knowledge or  
15 information to admit or deny the allegations therein and on that basis takes no  
16 position regarding these allegations.

17           d. Claimant admits that it is a technology company located in  
18 Colorado and that it paid a ransom in the approximate amount of [REDACTED]  
19 in March 2023 in response to a ransomware attack perpetrated against it. It paid the  
20 ransom to a ransomware group that self-identified as the Black Basta Group,  
21 following a cyberattack perpetrated with an initial point of entry via a QBot  
22 phishing email. Claimant's understanding and belief is that the Black Basta Group  
23 worked with affiliate Qbot or Qakbot. Claimant lacks knowledge or information to  
24 admit or deny the remaining allegations in Paragraph 20d and on that basis takes no  
25 position regarding these allegations.

26           e. Answering Paragraph 20e, Claimant lacks knowledge or  
27 information to admit or deny the allegations therein and on that basis takes no  
28 position regarding these allegations.

1 f. Answering Paragraph 20f, Claimant lacks knowledge or  
2 information to admit or deny the allegations therein and on that basis takes no  
3 position regarding these allegations.

4 g. Answering Paragraph 20g, Claimant lacks knowledge or  
5 information to admit or deny the allegations therein and on that basis takes no  
6 position regarding these allegations.

7 h. Answering Paragraph 20h, Claimant lacks knowledge or  
8 information to admit or deny the allegations therein and on that basis takes no  
9 position regarding these allegations.

10 i. Answering Paragraph 20i, Claimant lacks knowledge or  
11 information to admit or deny the allegations therein and on that basis takes no  
12 position regarding these allegations.

13 j. Answering Paragraph 20j, Claimant lacks knowledge or  
14 information to admit or deny the allegations therein and on that basis takes no  
15 position regarding these allegations.

16 k. Answering Paragraph 20k, Claimant lacks knowledge or  
17 information to admit or deny the allegations therein and on that basis takes no  
18 position regarding these allegations.

19 l. Answering Paragraph 20l, Claimant lacks knowledge or  
20 information to admit or deny the allegations therein and on that basis takes no  
21 position regarding these allegations.

22 m. Answering Paragraph 20m, Claimant lacks knowledge or  
23 information to admit or deny the allegations therein and on that basis takes no  
24 position regarding these allegations.

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**1      B. The USDC Addresses and USDT Addresses Held Ransom and  
2      Laundered Proceeds that Were Used to Promote the Qakbot Conspiracy**

**3**        21. Answering Paragraph 21, Claimant lacks knowledge or information to  
**4** admit or deny the allegations therein and on that basis takes no position regarding  
**5** these allegations.

**6**        22. Answering Paragraph 22, Claimant lacks knowledge or information to  
**7** admit or deny the allegations therein and on that basis takes no position regarding  
**8** these allegations.

**9**        23. Answering Paragraph 23, Claimant lacks knowledge or information to  
**10** admit or deny the allegations therein and on that basis takes no position regarding  
**11** these allegations.

**12**       24. Answering Paragraph 24, Claimant lacks knowledge or information to  
**13** admit or deny the allegations therein and on that basis takes no position regarding  
**14** these allegations.

**15**       25. Answering Paragraph 25, and all subparts therein, Claimant lacks  
**16** knowledge or information to admit or deny the allegations therein and on that basis  
**17** takes no position regarding these allegations.

**18**       26. Answering Paragraph 26, and all subparts therein, Claimant lacks  
**19** knowledge or information to admit or deny the allegations therein and on that basis  
**20** takes no position regarding these allegations.

**21      C. The April 2025 Wallets Received Ransom and Laundered Proceeds**

**22**       27. Answering Paragraph 27, and all subparts therein, Claimant lacks  
**23** knowledge or information to admit or deny the allegations therein and on that basis  
**24** takes no position regarding these allegations.

**25                  FIRST CLAIM FOR RELIEF**

**26**       28. Claimant hereby realleges and incorporates by reference each and every  
**27** preceding paragraph of this Answer as if set forth herein.

**28**

1        29. Paragraph 29 consists of legal conclusions and argument to which no  
2 response is required. To the extent a response is required, Claimant admits the  
3 allegations therein.

## **SECOND CLAIM FOR RELIEF**

5       30. Claimant hereby realleges and incorporates by reference each and every  
6 preceding paragraph of this Answer as if set forth herein.

7       31. Paragraph 31 consists of legal conclusions and argument to which no  
8 response is required. To the extent a response is required, Claimant admits the  
9 allegations therein.

## **THIRD CLAIM FOR RELIEF**

1       32. Claimant hereby realleges and incorporates by reference each and every  
2 preceding paragraph of this Answer as if set forth herein.

3       33. Paragraph 33 consists of legal conclusions and argument to which no  
4 response is required. To the extent a response is required, Claimant admits the  
5 allegations therein.

WHEREFORE, Claimant prays for relief as follows:

8       1. That, as a victim of the criminal offense underlying the forfeiture,  
9 Claimant recover the ransom in BTC that it paid in connection with the allegations  
10 contained in the Complaint, including present day value of the BTC and interest on  
11 that amount;

22       2. That Claimant be awarded its attorneys' fees and costs incurred in  
23 defending this action;

24       3. That Claimant be granted such other and further relief as the Court may  
25 deem just and proper.

1 DATED: November 7, 2025

COBLENTZ PATCH DUFFY & BASS LLP

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4 By:



5 RICHARD R. PATCH  
6 Attorneys for Claimant  
7 DISH NETWORK CORPORATION

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